



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NEW YORK 10007

NADINE IBRAHIM
Senior Counsel
nibrahim@law.nyc.gov
Phone: (212)356-5037
Fax: (212)356-1148

By ECF

August 25, 2022

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter. Defendants write to respectfully confirm with the Court the timing of defendants' opposition to plaintiffs' Motion to Deem RFAs Admitted and Compel Discovery Responses dated August 8, 2022 (Dkt. No. 721).

By way of background, prior to jointly moving to request that the Court stay certain discovery for sixty (60) days in this matter, defendants conferred with plaintiffs' counsel regarding the parameters of the proposed stay. In those discussions, the parties agreed that, within the contemplated stay period, the Office of the Attorney General would be permitted to serve her motion (Dkt. #721) regarding defendants' responses to plaintiffs' requests to admit; and the parties further agreed that defendants' response would not be due until two weeks after the expiration of the stay period. This understanding was memorialized in the Stipulation and Order that was ultimately endorsed by the Court on August 4, 2022 (Dkt.#718, ¶ 4(b)).

Defendants respectfully note to the Court that they object to the characterizations and any allegations of bad faith made in plaintiffs' letter. Defendants will respond more fully to these allegations at the time stipulated to by the parties and so ordered by the Court.

Thank you for your consideration herein.

Respectfully submitted,

Nadine Ibrahim s/

Nadine Ibrahim

Senior Counsel

Special Federal Litigation Division

cc: ALL COUNSEL (*via* ECF)